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OFFICE OF THE
EXECUTIVE SECRETARY
JUL 6, 2001

Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

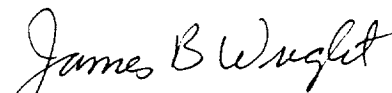
Re: Docket No. 97-00409: All Telephone Companies Tariff Filings
Regarding Reclassification of Pay Telephone Service.
UTSE Objections to TPOA Discovery

Dear Mr. Waddell:

Enclosed for filing are an original and thirteen copies of United Telephone-Southeast, Inc.'s Objections to the First Set of Data Requests from the Tennessee Payphone Owners Association. Copies are being served on counsel of record.

Please contact me if you have any questions.

Sincerely,


James B. Wright

cc: Parties of Record (with enclosure)
Laura Sykora
Kaye Odum

BEFORE THE
TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: All Telephone Companies Tariff Filings Regarding Reclassification of
Pay Telephone Service as Required by FCC Docket 96-128

DOCKET NO. 97-00409

UTSE OBJECTIONS
TO FIRST SET OF DATA REQUESTS FROM TPOA

United Telephone-Southeast, Inc. ("United" or "UTSE") makes the following objections to the First Set of Data Requests served on it by the Tennessee Payphone Owners' Association ("TPOA").

Data Request 1. Identify all differences between the revised cost study submitted by United on May 1, 2001 and the most recent cost study filed by United in Docket 97-00888 (Universal Service).

OBJECTION: United objects to this question on the basis that it is not relevant to this proceeding. The most recent cost study filed by United in Docket 97-00888 (Universal Service) was not adopted by the TRA for implementation of Tennessee's USF. A comparison to a cost study not approved by the TRA in a different docket is clearly irrelevant to this proceeding.

Data Request 4. Provide a detailed explanation of all material differences between United's cost study and the cost studies submitted by BellSouth and Citizens Communications in this docket. Include in the answer an explanation of any differences in methodology and any material differences in inputs.

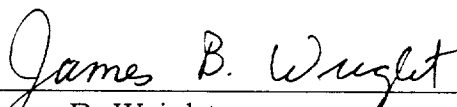
OBJECTION: United objects to the portion of this question that asks for United to perform a comparison of inputs between the various cost models. The TPOA is a party to this proceeding and has equal access to the same information as United. The information is not peculiarly within United's knowledge. The burden of ascertaining the answer is substantially the same for both parties since the TPOA can perform the requested activity as easily as United, thus the TPOA should perform its own analysis.

Data Request 7 (d). If it is Sprint's position that any of the rate elements listed in part b. have the same cost, explain in detail why the calculated cost is applicable to each element.

OBJECTION: United objects to this question on the basis that it is unclear. United is unable to understand what the question means and therefore United is unable to prepare a response.

Respectfully submitted,
UNITED TELEPHONE-SOUTHEAST, INC.

Dated: July 6, 2001



James B. Wright
Senior Attorney
14111 Capital Boulevard
Wake Forest, North Carolina

CERTIFICATE OF SERVICE; DOCKET 97-00409
(Pay Telephone Service Reclassification)

The undersigned hereby certifies that on June 6, 2001 the Objections of United Telephone-Southeast, Inc. to the TPOA First Data Request was served upon the following parties of record by fax or by depositing a copy thereof in the U.S mail addressed as follows:

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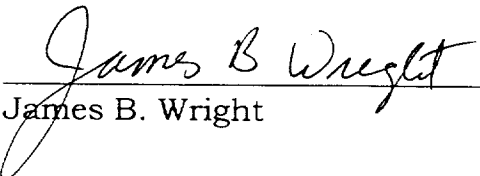
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